

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
AUSTIN DIVISION

CROSSROADS SYSTEMS, INC.,	§	
	§	
Plaintiff,	§	
	§	CIVIL ACTION NO. 1:10-CV-652-SS
v.	§	
	§	JURY DEMANDED
(1) 3PAR, INC.,	§	
(2) AMERICAN MEGATRENDS, INC.,	§	
(3) RORKE DATA, INC.,	§	
(4) D-LINK SYSTEMS, INC.,	§	
(5) CHELSIO COMMUNICATIONS, INC.,	§	
(a Delaware Corporation),	§	
(6) ISTOR NETWORKS, INC., and	§	
(7) CHELSIO COMMUNICATION, INC.,	§	
(a California Corporation),	§	
	§	
Defendants.	§	

**JOINT CLAIM CONSTRUCTION CHART OF DISPUTED  
TERMS FOR U.S. PATENT NOS. 6,425,035 AND 7,051,147**

Pursuant to the Court's December 2, 2010 Scheduling Order (Dkt. 88), Plaintiff Crossroads Systems, Inc. ("Crossroads") and Defendants 3PAR, Inc., Rorke Data, Inc., D-Link Systems, Inc. and iStor Networks, Inc. (collectively "Defendants") jointly submit the following claim construction chart containing each disputed claim term or phrase and a column with Plaintiff and Defendants' current proposed claim construction for the disputed claim term or phrase. Because of the commonality of claim terms in the two patents-in-suit, the parties are submitting one chart for the Court's convenience.

<b>Claim Term</b>	<b>Crossroads' Construction</b>	<b>Defendants' Construction</b>
Access controls	Controls which limit a device's access to a specific subset of storage devices or sections of a single storage device.	Controls that use a map to permit a particular device to read data from or write data to a particular storage space assigned to the device, and to prevent the device from reading data from or writing data to storage space assigned to other devices.
Allow(ing) access	Permit or enable communication to read or write data.	Does not need to be separately construed.
Allow(ing) access...to (the) (remote) storage device(s) using native low level, block protocol(s)  Control access...to the (at least one) (remote) storage device (...) using native low level, block protocol(s)  Implement access controls...using native low level, block protocol	Does not require construction.	Permit(ing) reading and writing of data in the native low level, block protocol of the storage device, without involving network servers, Ethernet networks, higher-level protocols such as TCP/IP, Ethernet protocols, network protocols or file system protocols, or translation from one protocol to another.
Block protocol(s)	Does not require construction.	A set of rules or standards for exchanging information with a block-oriented storage device.
Buffer	A memory device that is utilized to temporarily hold data.	A region of memory managed by a client process to temporarily hold data until retrieved by the same or another process, without necessarily preserving the data for multiple reads.
Configuration	Does not require construction.	"Map"; otherwise indefinite.
Connected to /Connects	Does not require construction; if the Court deems a construction necessary:	Attach(ed)(es) directly rather than through intervening devices.

<b>Claim Term</b>	<b>Crossroads' Construction</b>	<b>Defendants' Construction</b>
	"Attach(ed)(es) directly or attach(ed)(es) indirectly through intervening components."	
Contained in the map	All parties have provided constructions of "Map." "Contained in" does not need further construction.	Indefinite.
Control access	To limit a device's access to a specific subset of storage devices or sections of a single storage device.	Use a map to permit a particular device to read data from or write data to a particular storage space assigned to the device, and to prevent the device from reading data from or writing data to storage space assigned to other devices.
Device(s) (other than "Storage devices")	Any type of electronic device including, but not limited to, workstations.	Computer(s).
Fibre Channel initiator device	Does not require construction.	A computer that issues a command on a Fibre Channel bus using Fibre Channel protocol.
First transport medium	A first communications link.	Fibre Channel.
Implement(s)(ing) access controls for storage space on the (remote) storage devices	Provides controls which limit a device's access to a specific subset of storage devices or sections of a single storage device.	Does not need to be separately construed.
Initiator device	A device that issues requests for data or storage.	Does not need to be separately construed.
Low level...protocol(s)	Does not require construction.	A set of rules or standards that enable computers to exchange information without involving network servers, Ethernet networks, or higher-level protocols such as TCP/IP,

Claim Term	Crossroads' Construction	Defendants' Construction
		Ethernet protocols, network protocols or file system protocols.
LUN	A number identifying storage space on storage device(s).	A number identifying a storage device or a section of a storage device.
Maintain(ing) a (the) configuration	Keep(ing) a modifiable setting of information.	Does not need to be separately construed.
Map and mapping	To create a path from a device on one side of the storage router to a device on the other side of the router. A "map" contains a representation of devices on each side of the storage router, so that when a device on one side of the storage router wants to communicate with a device on the other side of the storage router, the storage router can connect the devices.	Creat(e)(ing) a map that defines a path from a device on one side of the storage router to LUN of a storage device on the other side of the router. A "map" is a table physically resident on the storage router that contains a representation of devices on one side of the router and LUNs of storage devices on the other side of the router and defines a path to connect a particular device with a particular LUN of a storage device assigned to the device.
Maps from the host device to a virtual representation of at least a portion of the storage space on the storage device to the storage device	Does not require construction.	Indefinite.
Native	Does not require construction.	Designed for use with a specific type of storage device.
Native low level block protocol(s)	A set of rules or standards that enable computers to exchange information and do not involve the overhead of high level protocols and file systems typically required by network servers.	See "native", "block protocol(s)", and "low level...protocol(s)".
Remote	Indirectly connected through at least one serial network	Connected through network interconnects and located at a

Claim Term	Crossroads' Construction	Defendants' Construction
	transport medium.	relatively large distance.
Representation	Does not require construction.	Indefinite.
Second transport medium	A second communications link.	A transport medium that is different from the first transport medium.
Storage device(s)	Any storage device, including, for example, a tape drive, CD-ROM drive, an optical drive or a hard disk drive.	A device such as a disk drive, tape drive or CD-ROM drive that uses magnetic or optical media to store data in a non-volatile manner.
Virtual LUN(s)	A LUN used to represent virtual local storage.	Indefinite.
Virtual representation	A representation of virtual local storage.	Indefinite.
Workstation(s)	A remote computing device that connects to the first (Fibre Channel) transport medium, and may consist of a personal computer.	A computer including human input/output devices such as a display and keyboard and designed for use by one person at a time.

Dated: February 28, 2011

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I hereby certify that on the 28<sup>th</sup> day of February, 2011, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

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